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19 *Michael Halprin*

20 **UNITED STATES DISTRICT COURT**
21 **DISTRICT OF NEVADA**

22 UNITED STATES OF AMERICA,

23 Case No.: 2:19-cr-00154-RFB-VCF-2

24 Plaintiff,

25 vs.

26 MICHAEL HALPRIN,

27 **JOINT STIPULATION TO CONTINUE**
28 **DEFENDANT HALPRIN'S SENTENCING**
29 **HEARING SCHEDULED FOR JANUARY**
30 **19, 2023**

31 Defendant.

32 IT IS HEREBY STIPULATED AND AGREED by and between JASON FRIERSON,
33 United States Attorney, District of Nevada, and JACOB OPERSKALSKI, Assistant United
34 States Attorney, representing the United States of America, LOUIS PALAZZO, NATHAN
35 GARRETT, and LUCINDA LUETKEMEYER, representing Defendant Michael Halprin, that
36 the sentencing hearing scheduled for January 19, 2023, at 9:00 a.m., in the above-captioned
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1 matter, be vacated and continued to a date and time to be set by this Honorable Court but no
2 sooner than one hundred fifty (150) days.

3 This stipulation is entered into for the following reasons:

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- 5 1. Sentencing in this matter is currently scheduled for January 19, 2023, at 9:00 a.m.
- 6 2. Defense counsel needs additional time to investigate issues relevant to sentencing and
7 prepare for sentencing.
- 8 3. Mr. Halprin has appeared in this case, and is not in custody and, along with the
9 government, agrees to this continuance.
- 10 4. The additional time requested herein is not sought for purposes of delay and the denial of
11 this request for a continuance could result in a miscarriage of justice.
- 12 5. Federal Rule of Criminal Procedure 32(b)(2) permits this Court to continue a sentencing
13 hearing for good cause. Good cause exists in this case.
- 14 6. Counsel for Defendant Michael Halprin and the government agree a continuance of the
15 sentencing hearing is in the best interests of justice.
- 16 7. For all the above-stated reasons, the ends of justice would be best served by the
17 continuance of the sentencing hearing.

18 This is the second request for a continuance of the sentencing hearing.

19 DATED: January 9, 2023.

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23 PALAZZO LAW FIRM
24 A PROFESSIONAL LAW
25 CORPORATION

26 By /s/ Nathan F. Garrett
27 T. Louis Palazzo, Esquire
28 GRAVES GARRETT, LLC
Nathan F. Garrett, *pro hac vice*
Lucinda H. Luetkemeyer, *pro hac vice*
Counsel for Defendant Michael Halprin

1 JASON FRIERSON
2 United States Attorney
3 By /s/ Jacob Operskalski
4 Jacob Operskalski
5 Assistant United States Attorney
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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
vs.
MICHAEL HALPRIN,
Defendant.

Case No.: 2:19-cr-00154-RFB-VCF-2

**JOINT STIPULATION TO CONTINUE
DEFENDANT HALPRIN'S SENTENCING
HEARING SCHEDULED FOR JANUARY
19, 2023**

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

Court finds that:

1. Sentencing in this matter is currently scheduled for January 19, 2023 at 9:00 a.m.
2. Defense counsel needs additional time to investigate issues relevant to sentencing and prepare for sentencing.
3. Mr. Halprin has appeared in this case, and is not in custody and, along with the government, agrees to this continuance.
4. The additional time requested herein is not sought for purposes of delay and the denial of this request for a continuance could result in a miscarriage of justice.
5. Federal Rule of Criminal Procedure 32(b)(2) permits this Court to continue a sentencing hearing for good cause. Good cause exists in this case.

For all of the above-stated reasons, the ends of justice would best be served by an order vacating the current sentencing hearing date and continuing the sentencing hearing date no sooner than one hundred fifty (150) days.

ORDER

IT IS HEREBY ORDERED that the sentencing hearing currently scheduled for January 19, 2023, at the hour of 9:00 a.m., be vacated and continued to June 22, 2023, at the hour of 9:00 am/pm.

DATED 10th day of January, 2023.

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THE HONORABLE RICHARD F. BOULWARE
UNITED STATES DISTRICT JUDGE